

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Crim. No. 1:21-cr-10104-PBS

VLADISLAV KLYUSHIN,

Defendant

ASSENTED-TO MOTION FOR EXCLUSION OF TIME UNDER  
THE SPEEDY TRIAL ACT

The United States of America, by and through Assistant United States Attorneys Seth B. Kosto and Stephen Frank, respectfully moves this Court to exclude the time period from February 9, 2022, the date of the initial status conference in this matter, through and including the date of the parties' next status conference, March 9, 2022, pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv), on the grounds that the ends of justice served by excluding this period outweigh the best interests of the public and the defendant in a speedy trial. In support of this request, the government states it produced substantial automatic discovery on or about February 2, 2022; counsel for the defendant has made several informal discovery requests and expects to make additional requests in the next two weeks, to which the government will respond. Thus, the time period from the February 9, 2022 status conference to the parties' next status conference on March 9, 2022 is a period of time that constitutes "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence," and that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial

Act, Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

Respectfully submitted,

NATHANIEL R. MENDELL  
Acting United States Attorney

By: /s/ Seth B. Kosto  
SETH B. KOSTO  
Assistant United States Attorney

February 11, 2022

CERTIFICATE OF SERVICE

I certify that this document was filed on the date listed below through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ Seth B. Kosto

SETH B. KOSTO

Assistant United States Attorney

Dated: February 11, 2022